

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

RACHEL RAMSBOTTOM,)	
ALEXIS BOWLING ,)	
JENNA HOUSTON,)	
JANE DOE #1)	
Plaintiffs,)	
)	CIVIL ACTION NO. 3:21-cv-00272
)	
v.)	
)	JURY TRIAL DEMANDED
LORIN ASHTON,)	
AMORPHOUS MUSIC, INC.,)	
BASSNECTAR TOURING, INC.,)	
REDLIGHT MANAGEMENT, INC.,)	
C3 PRESENTS, L.L.C,)	
INTERACTIVE GIVING FUND,)	
GNARLOS INDUSTRIES, LLC,)	
CARLOS DONOHUE; ABC)	
CORPORATIONS, ONE THROUGH)	
TEN (said Names Being Fictitious),)	
JOHN DOES, ONE THROUGH TEN)	
(said Names Being Fictitious))	
Defendants.)	

MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Local Rule 83.01, Brendan D. O'Toole, by and through the undersigned, hereby moves for admission to appear *pro hac vice* in the above-captioned action as counsel for Defendant Red Light Management, Inc.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct:

1. I am a member in good standing with the United States District Court for the Eastern District of Virginia. Attached is a Certificate of Good Standing from that court.

2. I am not, nor have I ever been, the subject of disciplinary proceedings by any disciplinary authority, court, or tribunal.

3. I have not been found in contempt by any court or tribunal.
4. I have not been sanctioned pursuant to 28 U.S.C. § 1927.
5. I have never been censured, suspended, disbarred, or denied admission or readmission by any court or tribunal.
6. I have not been charged, arrested, or convicted of a criminal offense or offenses.
7. I understand that pursuant to Local Rule 83.01(d)(1), if I am not both a member of the Tennessee bar and admitted to the bar of this Court, local counsel must be retained. Below is the name, address, phone number and e-mail address of local counsel retained in this matter:

Paige W. Mills (BPR #016218)
Ashleigh Karnell (BPR #036074)
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8. I have read and am familiar with the Local Rules of Court for the United States District Court for the Middle District of Tennessee.
9. By seeking admission to practice before this Court, I acknowledge my responsibility for compliance with all rules of this Court and confer disciplinary jurisdiction upon this Court for any alleged misconduct arising in the course of the proceeding.

Dated: August 19, 2021

Respectfully Submitted,

/s/ Brendan D. O'Toole
Brendan D. O'Toole (VA Bar #71329)
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/s/ Paige W. Mills

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*Attorneys for Defendant Red Light
Management, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of August 2021, the foregoing was filed electronically with the Clerk of the Court and was served by the Court's electronic filing system upon the following:

<p>Phillip Miller 631 Woodland Street Nashville, TN 37206 615-356-2000 pmiller@seriousinjury.com</p> <p>Brian Kent M. Stewart Ryan Alexandria MacMaster LAFHEY, BUCCI & KENT, LLP 1100 Ludlow Street, Suite 300 Philadelphia, PA 19107 bkent@lbk-law.com sryan@lbk-law.com amacmaster@lbk-law.com</p> <p style="text-align: center;"><i>Attorneys for Plaintiffs</i></p>	<p>Russell B. Morgan Jason C. Palmer Rachel Sodée BRADLEY ARANT BOULT CUMMINGS LLP 1600 Division Street, Suite 700 Nashville, Tennessee 37203 rmorgan@bradley.com jpalmer@bradley.com rsodee@bradley.com</p> <p>R. Scott McCullough MCNABB, BRAGORGOS BURGESS & SORIN, PLLC 81 Monroe Avenue, Sixth Floor Memphis, TN 38103-5402 smccullough@mbbslaw.com</p> <p style="text-align: center;"><i>Attorneys for Defendant C3 Presents, L.L.C.</i></p>
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<p>Grace A. Fox Robert A. Peal Mark W. Lenihan SIMS FUNK, PLC 3322 West End Avenue Suite 200 Nashville, TN 37203 gfox@simsfunk.com rpeal@simsfunk.com mlenihan@simsfunk.com</p> <p>Kimberly S. Hodde HODDE & ASSOCIATES 40 Music Square East Nashville, TN 37203 kim.hodde@hoddelaw.com</p> <p>Mitchell Schuster Stacey M. Ashby MEISTER, SEELIG & FEIN, LLP 125 Park Avenue, 7th Floor New York, NY 10017 ms@msf-law.com</p> <p><i>Attorneys for Defendants Lorin Ashton, Amorphous Music Inc., and Bassnectar Touring, Inc.</i></p>	<p>Bennett James Wills Brian T. Boyd LAW OFFICE OF BRIAN T. BOYD 214 Overlook Cir., Suite 275 Brentwood, TN 37027 bennett@boydlegal.com brian@boydwills.com</p> <p><i>Attorneys for Defendant Interactive Giving Fund</i></p>
<p>Cynthia A. Sherwood Davis F. Griffin SHERWOOD BOUTIQUE LITIGATION, PLC 201 Fourth Avenue North, Suite 1130 Nashville, TN 37219 cynthia@sherwoodlitigation.com</p> <p><i>Attorneys for Defendants Carlos Donohue and Gnarlos Industries, LLC</i></p>	

/s/ Paige W. Mills